

October 15, 1997

WHS 97-06

TO: County Agricultural Commissioners

SUBJECT: METHYL BROMIDE TREE HOLE FUMIGATION

As you may be aware, the Department of Pesticide Regulation (DPR) is concerned about a disproportionate number of injuries associated with the use of methyl bromide for tree hole fumigation. Since the time for issuing permits is approaching, we thought an update on the progress of developing mitigation measures and some interim precautionary warnings might be in order.

Our review of reported injuries shows a number of applicators have been injured by contacting liquid or high vapor levels of methyl bromide emitting from the application probes or injection hole. Some injuries have involved painful burns to the legs and feet. Many probes do not have a positive shut off mechanism at the end of the probe. When the probe is withdrawn from the soil, vapor or liquid methyl bromide may contact, or come in close proximity to, the applicator's lower extremities. In addition, the common practice of stomping the hole closed after the probe may also have contributed to some of the injuries.

DPR's Worker Health and Safety (WH&S) Branch has been working with a major tree hole fumigant and equipment supplier to resolve this issue. This supplier has developed two prototype injection probes that we think will provide greater control over the emissions of fumigant. These probes will be used in some field evaluation tests in the near future. During these field tests, WH&S plans to conduct testing in anticipation of documenting the improved control over the fumigation. Based on the results of the testing, WH&S will recommend to the Pesticide Enforcement Branch, permit conditions specific for tree hole fumigation. DPR's Environmental Monitoring and Pest Management Branch will also make recommendations specific to this type of fumigation.

Before permit conditions are developed and issued, please inform permit applicants of DPR's concern with this application method. Knowledge of the potential hazards and thorough employee training will help to minimize the risk

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of injury. In particular, applicators should be given instructions to minimize exposure to any liquid or vapor when the probe is withdrawn. To avoid possible contact of the legs and feet with liquid, applicators should allow extra time for liquid fumigant to drain before withdrawing the probe. Applicators should cover the hole with a shovel full of soil, rather than use their feet.

For help with tree hole application safety related questions, contact Mr. Harvard Fong, or Mr. Dennis Gibbons, in the Worker Health and Safety Branch, at (916) 445-4222.

Sincerely,

[Original signed by John M. Donahue]

John M. Donahue, Chief
Worker Health and Safety Branch
(916) 445-4222

cc: Mr. Daniel J. Merkley, County Agricultural Commissioner
Liaison
Mr. Dennis Gibbons
Mr. Harvard Fong